4.1 GENERAL CEQA REQUIREMENTS

CEQA requires that a reasonable range of alternatives to the proposed project be described and considered within an EIR. The alternatives considered should represent scenarios that could feasibly attain most of the basic objectives of the project, but will avoid or substantially lessen any of the significant environmental effects. The purpose of this process is to provide decision makers and the public with a discussion of viable development options, and to document that other options to the proposal were considered within the application process (CEQA Guidelines, Section 15126.6).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a project as proposed will still cause significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA.

CEQA provides the following guidelines for discussing project alternatives:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (§15126.6(a)).

- An EIR is not required to consider alternatives which are infeasible (§15126.6(a)).

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project (§15126.6(b)).

- The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (§15126.6(c)).

- The EIR should briefly describe the rationale for selecting the alternatives to be discussed (§15126.6(c)).

- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project (§15126.6(d)).

4.2 RELATIONSHIP TO PROJECT OBJECTIVES

The following is a summary of the primary objectives of the Cochrane Road Planned Unit Development (PUD), as stated by the project applicant and the City of Morgan Hill. The objectives provide an important benchmark in conducting the comparative alternatives analysis and the feasibility of each. As discussed previously, an alternative is only meaningful for consideration if it can meet the basic objectives of the project as proposed. Project objectives include the following:

- To provide a retail development that meets the current unmet demand for goods and services and entertainment from consumers residing in the trade area for the City of Morgan Hill and from future residential developments;

- To provide a commercial retail shopping center that serves both the local and regional market area to attract new customers and retailers into the City of Morgan Hill;

- To provide a commercial development that results in a net fiscal benefit to the City of Morgan Hill by generating new sales tax revenue from Morgan Hill residents as well as non-residents attracted to the shopping center, and by increasing property tax revenues;

- To provide a commercial retail shopping center on a large, undeveloped lot in close proximity to an existing highway, near other commercial centers and residential areas, in order to minimize travel lengths and utilize existing infrastructure to the extent possible;

- To provide a commercial center of at least 50 net acres to provide sufficient development area to allow a mixture of uses (including lifestyle and/or entertainment attractions) to create a destination commercial center that will attract various types of customers to the City;

- To create an atmosphere of fun, entertainment, and relaxation for customers in addition to a shopping experience;

- To provide a commercial development that can be adequately served by public services and utilities in a feasible manner;

- To substantially reduce sales dollar leakage out of the City of Morgan Hill;

- To provide a commercial development that creates new jobs for City residents; and
- To complete the development of a large scale retail shopping center on the subject property in a manner substantially consistent with the goals and policies of the

City's General Plan Designation as `Commercial – Sub-Regional Commercial Site Overlay´ and its Zoning Designation as `PUD (HC).´

4.3 ALTERNATIVES CONSIDERED BUT REJECTED

The following alternate site location alternatives were considered, but rejected from further analysis.

SOUTHWEST CORNER OF EAST DUNNE AVENUE AND MURPHY AVENUE

This alternate site consists of three parcels (APNs: 817-12, 010, and 011) and is comprised of approximately 13.88 acres. These parcels are zoned `Planned Unit Development (PUD)´ with a land use designation of `Commercial´ in the *City of Morgan Hill General Plan*. This alternate site is considered a gateway in the *City of Morgan Hill General Plan* and would be required to provide a high quality of architecture and landscape design similar to the project site. Similar to the project site, uses within this designation are intended to meet the retail and related service needs of residents living in this area. This alternate site was rejected from further consideration because the site is too small to meet the objectives of the proposed project and has potential traffic and circulation impacts, as the Murphy Avenue/East Dunne Avenue intersection, which would provide the main access to the project site, is already operating at LOS D under existing conditions.

SOUTHWEST CORNER OF TENNANT AVENUE AND U.S HIGHWAY 101

This alternate site location consists of five parcels (APNs: 817-08-14, 15, 19, 30, and 32) and is comprised of approximately 25.78 acres. This alternate site location is vacant except for an existing church located on parcel 817-08-14. This site is similar to the project site in that it provides visibility along U.S. Highway 101; however, this location was rejected because the site is too small to meet the objectives of the proposed project.

4.4 PROJECT ALTERNATIVES

As identified within various sections of this EIR, the proposed project would result in significant environmental impacts. The proposed project would result in a significant and unavoidable impacts to agricultural resources, air quality, noise, and traffic and circulation. All other impacts identified in the EIR can be mitigated to a less than significant level with the adoption of mitigation measures as specified within this DEIR. Notwithstanding, this alternatives discussion briefly identifies and examines a range of alternatives as developed with City staff:

- **Alternative 1 – No Project/No Development Alternative**
- **Alternative 2 – Supermarket Alternative**

- **Alternative 3 – Reduced Density Alternative**
- **Alternative 4 – Alternate Location Alternative**

Environmental impacts associated with each of the four alternatives are compared with impacts resulting from the proposed project. The impact level of the alternative as compared to the project (less, similar, or greater) is noted in parentheses at the beginning of each comparison. **Table 4-2** at the conclusion of the Section provides a summary. This Section also includes identification of the "environmentally superior" alternative.

ALTERNATIVES ANALYSIS

Alternative 1 – No Project/No Development

CEQA Guidelines Section 15126.6(e)(3) requires that a `No Project/No Development Alternative' be evaluated as part of an EIR, proceeding along one of two lines: the project site remaining in its existing undeveloped state, or development of the project site under existing underlying land use designations. The `No Project/No Development Alternative´ considers the comparative environmental effects of not approving the proposed project, with the site remaining in its current rural residential and agricultural state, since the underlying General Plan land use designation of `Commercial´ would result in a similar project as is currently proposed.

The impacts associated with the `No Project/No Development Alternative´ alternative are discussed below:

Comparative Analysis

Aesthetics and Visual Resources (less). Under the `No Project/No Development Alternative,´ there would be no visual change to the project site. The existing rural character of the project site would remain and the northern gateway, the U.S. Highway 101/Cochrane Road interchange, to the City of Morgan Hill would be preserved in its existing condition. Therefore, the `No Project/No Development Alternative' would result in **less** impacts to aesthetics and visual resources than the proposed project.

Agricultural Resources (less). Impacts to agricultural resources under the `No Project/No Development Alternative´ would not occur and potential conflicts between agricultural and commercial uses would be essentially eliminated. Therefore, the `No Project/No Development Alternative´ would result in less impacts than the proposed project to agricultural resources.

Air Quality (less). The potentially significant short-term air quality impacts that would result from construction of the proposed project, including dust, mud, and debris generated

by construction activity, exposed or disturbed soil surfaces, and stockpiles of materials, would not occur under this alternative. Long-term operational air quality emissions from an increase in the number of vehicles traveling to the project site and stationary source emissions from a possible fuel station would be eliminated. Therefore, the `No Project/No Development Alternative´ would result in less air quality impacts than the proposed project.

Biological Resources (less). The potentially significant impacts to special status and other wildlife species, including burrowing owl, and migratory birds would not occur under this alternative. Leaving the site in rural residential and agricultural uses would allow it to continue as potential foraging and nesting habitat. Therefore, the `No Project/No Development Alternative´ would result in less impacts than the proposed project.

Cultural Resources (less). The potentially significant impacts to cultural or archaeological resources resulting from eventual site construction would not occur under this alternative, as on-site conditions would remain unchanged. Therefore, the `No Project/No Development Alternative´ would result in less impacts to cultural resources than the proposed project.

Geology and Soils (less). The potentially significant impacts relating to ground shaking, earthquake-induced settlement, or adverse soil characteristics would not result with implementation of the `No Project/No Development Alternative.´ Therefore, the `No Project/No Development Alternative´ would result in less impacts from the effects of geology and soils than the proposed project.

Hazards and Hazardous Materials (less). The `No Project/No Development Alternative´ would reduce the exposure to hazardous substances such as pesticides, asbestos containing materials, and lead associated with the demolition of the existing buildings at the project site. Therefore, the `No Project/No Development Alternative' would result in less impacts from hazards and hazardous materials than the proposed project.

Surface Water Hydrology and Water Quality (less). The `No Project/No Development Alternative' would essentially eliminate drainage flows and surface water quality impacts associated with the proposed project. Therefore, the `No Project/No Development Alternative´ would result in less impacts than the proposed project to hydrology and water quality.

Land Use and Planning (similar). The `No Project/No Development Alternative´ would be inconsistent with the *City of Morgan Hill General Plan* which designates the project site as the location of a sub-regional commercial site. However, the `No Project/No Development Alternative´ would avoid any potential for urban decay due to secondary economic impacts. Therefore, the `No Project/No Development Alternative´ would result in similar impacts as the proposed project with respect to land use and planning.

Noise (less). The `No Project/No Development Alternative´ generates noises typically produced by cultivation, harvesting, and other agricultural activities that are currently occurring on the project site. However, the potentially significant short-term impact of noise generated by construction activities, stationary noise sources (e.g. mechanical equipment, etc.) and the significant long-term operational impact of vehicles generated by the proposed project, would not occur under this alternative. Therefore, the `No Project/No Development Alternative´ would result in less impacts from noise than the proposed project.

Public Services (less). The potential impacts to law enforcement, fire services, and other services would not occur under this alternative as there would be no increased demand for these services. Therefore, the `No Project/No Development Alternative´ would result in less impacts than the proposed project.

Transportation and Circulation (less). The potentially significant impacts of increased traffic within the vicinity of the project would not occur under this alternative. Although the impacts of project-generated traffic would be mitigated by improvements to the transportation network as described in Section 3.12, the additional traffic would represent a substantial difference in comparison to the `No Project/No Development Alternative.´ Therefore, the `No Project/No Development Alternative' would result in less impacts than the proposed project.

Utilities (less). The potential impacts to groundwater, wastewater, solid waste facilities and other utilities would not occur under the `No Project/No Development Alternative´ as there would be no increased demand for these services. Therefore, the `No Project/No Development Alternative´ would result in less impacts than the proposed project.

The `No Project/No Development Alternative´ does not meet any of the project objectives.

Alternative 2 – Supermarket Alternative

The `Supermarket Alternative' assumes replacement of approximately 50,000 square feet of commercial uses and construction of a 50,000 square foot supermarket at the project site. The intent of the `Supermarket Alternative´ is to meet Policy 9g in the *City of*

Morgan Hill General Plan, which plans for a future grocery store east of U.S. Highway 101 along Cochrane Road. All other components of the `Supermarket Alternative´ would be similar to the proposed project. If this alternative were selected all mitigation measures incorporated herein would be applicable and one additional traffic mitigation measure would be required for transportation and circulation. The impacts associated with the 'Supermarket' alternative are discussed below:

Comparative Analysis

Aesthetics and Visual Resources (similar). Construction of a supermarket instead of 50,000 square feet of commercial/retail space would have similar effects as the proposed project with respect to the change in visual character and increased light and glare.

Agricultural Resources (similar). The `Supermarket Alternative´ would have similar impacts to the proposed project with respect to the conversion of the project site from rural residential and agricultural uses to urban uses and potential agricultural-urban conflicts.

Air Quality (greater): The `Supermarket Alternative´ would result in an increase of approximately 3,134 daily trips with 60 additional trips during the AM peak hour, 241 trips during the PM peak hour, and 216 trips during the Saturday midday peak hour. This increase in the number of vehicle trips to the project site would result in a subsequent increase in air quality emissions. As emissions associated with the proposed project exceed the BAAQMD significance thresholds, the `Supermarket Alternative´ would result in a greater range of impacts than the proposed project that would further exacerbate regional air quality conditions. Therefore, the `Supermarket Alternative' would result in a greater range of impacts than the proposed project with respect to air quality.

Biological Resources (similar). The `Supermarket Alternative´ would result in similar impacts as the proposed project to special status and other wildlife species, including burrowing owl, and migratory birds and the conversion of potential foraging and nesting habitat. As such, this alternative would result in no substantial difference over the proposed project with respect to biological resources.

Cultural Resources (similar). Since there are no known historic, archaeological, or paleontological resources present at the project site, the `Supermarket Alternative´ would result in similar impacts to the proposed project with respect to cultural resources. In the event of discovery of previously unknown resources at the project site, contingent mitigation measures, as identified in Section 3.5, Cultural Resources, would be applied that would reduce the potentially significant effects to a less than significant level for both the proposed project and the `Supermarket Alternative.´ As such, this alternative would result in no substantial difference over the proposed project with respect to cultural resources.

Geology and Soils (similar). All geologic, soils, and seismic conditions and hazards affecting both the proposed project and the `Supermarket Alternative´ would be mitigated to a less than significant level through geotechnical engineering measures. Therefore, there would be no substantial difference between the proposed project with respect to geology and soils impacts.

Hazards and Hazardous Materials (similar). Since potential effects from hazardous materials would be mitigated to a less than significant level through implementation of mitigation measures incorporated within Section 3.8, Hazards and Hazardous Materials, there would be no impacts from hazardous materials associated with either the proposed project or the `Supermarket Alternative.´ In addition, a proposed supermarket would likely involve the same range of hazardous materials as a retail use. As such, there is no substantial difference in terms of hazardous materials impacts between the proposed project and the `Supermarket Alternative' with respect to hazards and hazardous materials.

Surface Water Hydrology and Water Quality (similar). The drainage impacts of the `Supermarket Alternative´ and that of the proposed project would result in similar volumes of stormwater runoff. These impacts would be mitigated to a less than significant level through the construction of appropriately-sized stormwater basins. The erosion impacts and potential for non-point source pollution of surface water from urban pollutants would be similarly mitigated for both alternatives as discussed in Section 3.8, Surface Water Hydrology and Water Quality. As such, there would be no substantial difference between the proposed project and the `Supermarket Alternative´ with respect to surface water hydrology and water quality.

Land Use and Planning (similar). The `Supermarket Alternative´ would meet the intent of Policy 9g in the *City of Morgan Hill General Plan*, which plans for a future grocery store east of U.S. Highway 101 along Cochrane Road. This alternative would generally include the same range of land uses as the proposed project and would be considered consistent with the *City of Morgan Hill General Plan* and the *City of Morgan Hill Planning and Zoning Codes*. Under this alternative, the additional sales likely to be captured from Morgan Hill stores in combination with a supermarket would not be likely to lead to closures due to the potential cumulative impacts at the Wal Mart Supercenter in the City of Gilroy. Each of the major supermarkets is performing at levels capable of sustaining this level of additional sales loss, assuming the losses are shared somewhat equally. Therefore, there would be no substantial difference between the `Supermarket Alternative´ and the proposed project with respect to land use and planning.

Noise (similar). The `Supermarket Alternative´ would result in an increase of approximately 3,134 daily trips with 60 additional trips during the AM peak hour, 241 trips during the PM peak hour, and 216 trips during the Saturday midday peak hour. However,

this alternative would result in a similar range of noise impacts as the proposed project with respect to long-term operational noise levels.

Public Services (similar). The `Supermarket Alternative' would result in similar impacts to public services. Increased demand for fire protection, law enforcement, and other public services would not be significant for the proposed project and would not be significant for the `Supermarket Alternative.' Therefore, there is no substantial difference between this alternative and the proposed project with respect to public services.

Transportation and Circulation (greater). The traffic impact analysis prepared by Fehr and Peers Associates evaluated construction of a 60,000 square foot supermarket at the project site as an alternative project scenario, therefore the transportation and circulation impacts associated with this alternative would be slightly conservative since the trip generation rates for a supermarket land use are substantially higher. Additionally, as discussed for the proposed project in Section 3.12, Transportation and Circulation, the site plan shows the fuel station as an optional use on Pad 2, and shows that the primary proposed use for this pad is 6,000 square feet of retail space. However, since the 12-position fuel station would generate substantially more traffic than the planned retail space for this location, the traffic analysis for the `Supermarket Alternative' is based on development of Pad #2 with a fuel station in order to present a worst-case analysis. Also, it should be noted that the current site plan shows a total retail floor area (including garden center) of 588,050 square feet assuming fuel station use for Pad 2. This is 2,050 square feet less than the floor area used in this traffic analysis, which was based on a previous version of the site plan. Since the traffic analysis is therefore based on a project size, which is approximately 0.4 percent larger than currently proposed, the resulting calculations may be slightly conservative for the `Supermarket Alternative,' however, the difference is not great enough to affect the findings, conclusions, or recommendations contained in the traffic impact analysis.

Trip Generation. The amount of traffic generated by the alternate project description was estimated using the process discussed in Section 3.12, Transportation and Circulation. Trip generation rates for `Supermarket' from *Trip Generation* (Institute of Transportation Engineers, 7th Edition) were used to estimate the number of trips generated by a supermarket in this location. A pass-by/diverted link reduction of 25 percent was also applied to the supermarket. To account for the internalization of trips within the site, a 20 percent reduction was applied to peak hour supermaket trip generation. **Table 4-1** presents the trip generation estimates for the `Supermarket Alternative.'

Under the `Supermarket Alternative,' 25,143 new daily trips, with 593 trips during the AM peak hour, 2,110 trips during the PM peak hour and 2,631 net new Saturday midday peak-hour trips would be generated. Compared to the proposed project, the `Supermarket Alternative' would generate approximately 3,134 additional daily trips, 60 additional AM

peak-hour trips, 241 additional PM peak-hour trips, and 216 additional Saturday midday peak-hour trips.

TABLE 4-1
SUPERMARKET ALTERNATIVE
TRIP GENERATION ESTIMATES

Item	Weekday	AM Peak Hour			PM Peak Hour			Sat Peak Hour		
	Total	In	Out	Total	In	Out	Total	In	Out	Total
Trip Rates										
Shopping Center (ksf)	37.88	0.63	0.40	1.03	1.70	1.85	3.55	2.51	2.32	4.83
Supermarket (ksf)	102.24	1.98	1.27	3.25	5.33	5.12	10.45	5.49	5.27	10.76
Gas-Service Station (Fueling Position)	152.84	5.43	5.21	10.64	6.67	6.67	13.33	9.44	9.07	18.50
Movie Theater (screen)	292.50	0.0	0.0	0.0	13.81	9.21	23.02	14.38	5.59	19.97
Trip Estimates										
Shopping Center (530.1 ksf)	20,080	333	213	546	903	979	1,882	1,331	1,228	2,559
Supermarket (60 ksf)	6,134	119	76	195	320	307	627	329	317	646
Gas-Service Station (12 Fueling Positions)	1,834	65	63	128	80	80	160	113	109	222
Movie Theater (14 screens)	4,095	0	0	0	193	129	322	201	79	280
Gross Project Trips	*32,143*	*517*	*352*	*869*	*1,496*	*1,495*	*2,991*	*1,974*	*1,733*	*3,707*
Shopping Center Pass-by/Diverted Trip Reduction[2]	-4,016	-69	-68	-137	-236	-235	-471	-320	-320	-640
Supermarket Pass-by/Diverted Trip Reduction[2]	-1,227	-25	-24	-49	-79	-78	-157	-81	-81	-162
Gas-Service Station Pass-by/Diverted Trip Reduction (40%)	-734	-26	-25	-51	-32	-32	-64	-45	-44	-89
Theater Internalization[3]	-410	0	0	0	-32	-32	-64	-65	-64	-129
Supermarket Internalization[3]	-613	-20	-19	-39	-63	-62	-125	-65	-64	-129
Net New Project Trips	**25,143**	**377**	**216**	**593**	**1,054**	**1,056**	**2,110**	**1,435**	**1,196**	**2,631**

Notes:

[1] Trip rates are expressed as trips per 1,000 s.f. (ksf) or per screen.

[2] Pass-by/Diverted trip reduction 20 percent daily and 25 percent during peak hour.

[3] Internalization trip reduction 10 percent daily and 20 percent during peak hour.

Source: *Trip Generation* (Institute of Transportation Engineers, 7th Edition).

Source: Fehr and Peers, Inc. 2005

Intersection Levels of Service. The Level of Service (LOS) calculations performed by Fehr and Peers, Inc. used existing count data and lane configurations, list of approved and pending developments supplied by city staff, and the alternate project-generated trips. The results of the intersection LOS calculations are presented in **Table 4.2** for the `Supermarket Alternative.'

The intersections of Cochrane Road/U.S. Highway 101 northbound ramps, Cochrane Road/Mission View Drive, and Dunne Road/Monterey Road are projected to operate at unacceptable levels of service during one or more peak hours. The remaining intersections would operate at acceptable levels of service.

Based upon the criteria presented in the previous chapter, the `Supermarket Alternative' would result in a significant impact to the three intersections operating at unacceptable levels: Cochrane Road/U.S. Highway 101 northbound ramps, Cochrane Road/Mission View Drive, and Dunne Road/Monterey Road. **Mitigation Measures MM 3.12-1a** and **MM 3.12-1b** incorporated in Section 3.12, Transportation and Circulation would reduce these potentially significant impacts to a less than significant level. In addition, the `Supermarket Alternative' would require the westbound approach of the U.S. Highway 101/Cochrane Road intersection to be converted to provide one separate through lane and one shared through right-turn lane to improve the level of service at this intersection to LOS D during the Saturday peak hour. Improvements to this intersection would have to be approved by Caltrans as well as the City of Morgan Hill. Caltrans typically requires submittal of approved plans along with encroachment applications and fees before approvals are issued. With implementation of these improvements the `Supermarket Alternative' would have a less than significant impact.

Parking. The parking analysis conducted by Fehr and Peers, Inc., for the `Supermarket Alternative' was based on a 50,000 square foot supermarket. The results of the parking analysis are incorporated in Appendix F of the traffic impact analysis, which is Appendix K of this EIR. The number of parking spaces provided on the preliminary site plan is 3,025 stalls. (This total applies to both the retail and fuel station alternatives for Pad 2, which both show 12 spaces.)

Required Supply Based on City Code. As discussed in the discussion of parking for the proposed project, the ITE peak parking rate for the `shopping center' was used to calculate the city parking requirement for retail and restaurant space. The peak rate is 3.21 spaces per 1,000 square feet of space, which was then increased by ten percent to account for a circulation factor (i.e., to allow vehicles to park without having to circulate through the project site and wait for a space to become available). This results in a required parking rate of 3.53 spaces per 1,000 square feet or one space/283 square feet. (It should be noted that municipal parking rates typically incorporate a similar 10 percent circulation factor within their required parking rates, although this is not usually stated.)

For movie theatre space, the City of Morgan Hill code requires one space for every 3.5 seats or one space per 32 square feet of usable seating area (whichever is greater). The rate of one space per 3.5 seats was used in this analysis to estimate the movie theater parking supply because the exact size of usable movie theater space is unknown at this time.

For the alternative supermarket land use presented under the `Supermarket Alternative', the City code requires one parking space per 250 square feet of floor area.

These rates result in a required supply of 2,979 spaces (i.e., 544,050 square feet of retail space at one space/283 square feet equals1,922 spaces; 3,000 seats at one space/3.5 seats equals 857 spaces; and 50,000 square feet of supermarket space at one space/250 square feet equals 200 spaces). Therefore, the proposed parking supply of 3,025 spaces shown on the preliminary site plan exceeds the supply requirement by 46 spaces indicated under this methodology.

Shared Parking Analysis. As with the parking evaluation for the proposed project, this parking analysis for the `Supermarket Alternative' included a second study based on a methodology using the ITE rates for shared parking.

The shared parking analysis for the weekend day shows that the projected peak parking demand would be 2,831 spaces at 1:00 PM. This overall demand includes a ten percent circulation factor, as was applied under the first methodology above. The proposed supply of 3,025 spaces shown on the preliminary project site plan would meet the peak weekend parking requirement by 194 spaces indicated through application of this methodology.

The results of the weekday shared parking analysis show that the expected peak demand would be 1,866 spaces at 1:00 PM. This demand also includes a ten percent circulation factor. Therefore, the proposed supply of 3,025 spaces indicated on the project site plan would meet the peak weekday parking requirement of 1,866 spaces indicated under this methodology.

A further calculation was conducted to determine the amount of restaurant space that could be allowed with the proposed supply (3,025 spaces). Using the shared parking

methodology including the supermarket, it was determined that 18,000 square feet of sit-down restaurant space could be accommodated. Since sit-down restaurant space has a higher parking demand (13.5 spaces/1,000 square feet) than fast food space (9.5 spaces/1,000 square feet) a mix of the two restaurant types would allow for a slightly higher total. For example, if the ratio of sit-down to fast food restaurant was roughly 60 percent to 40 percent, it is estimated that approximately 20,000 square feet of restaurant space would be able to be accommodated in the project site with the proposed supply of 3,025 parking spaces.

Impact Assessment. As discussed in Section 3.12, Transportation and Circulation, both of the parking methodologies could underestimate actual parking demand for the `Supermarket Alternative' depending on the mix of tenants. This is because both methods use the ITE shopping center rates to encompass both retail and restaurant uses. This is a valid approach since the ITE shopping center rate does include some provision for restaurants, although the proportion of restaurants assumed in the rate is unknown. It is also a necessary approach since the proportion of restaurant space to be included in the project has not yet been determined. However, it is reasonable to conclude that the proportion of restaurants contemplated in the ITE shopping center rate is minor given that the parking demand rates for all types of restaurants are substantially higher than the shopping center rate. As such, the above calculations of parking demand would only be valid if the actual amount of restaurant space ultimately proposed is also minor. If a substantial proportion of the project is occupied by restaurants, the project could potentially face a parking deficiency unless the parking supply is increased.

Environmental documents prepared under CEQA, including supporting technical reports on traffic and parking impacts, are to assume reasonable worst-case conditions in the absence of specific project information. In the case of the `Supermarket Alternative,' there is a likelihood that a parking deficiency of undetermined magnitude will occur if more than a minor amount of restaurant space is included in the project. This represents a potentially significant impact under the `Supermarket Alternative.' Implementation of mitigation measures incorporated into the proposed project would reduce this impact to a less than significant level. Therefore, there is no substantial difference between the `Supermarket Alternative' and the proposed project with respect to parking.

Freeway Impacts. The freeway segments for the `Supermarket Alternative´ would provide higher densities. Therefore, the same impact to the northbound segment of U.S. Highway 101 between Tennant Avenue and Dunne Avenue during the AM peak hour would occur as would occur under project conditions. The mitigation measure for this impact under the `Supermarket Alternative´ would be to implement the "immediate actions" list required as Mitigation Measure 3.12-2. The `Supermarket Alternative´ would also result in a significant and unavoidable impact to this freeway segment and therefore, there would be no substantial difference between this alternative and the proposed project.

TABLE 4-2
BACKGROUND AND SUPERMARKET ALTERNATIVE INTERSECTION LEVELS OF SERVICE

Intersection	Peak Hour[1]	Background		Alternate Project (with Supermarket)			
		Delay[2]	LOS[3]	Delay	LOS	Δ in Crit. V/C[4]	Δ in Crit. Delay[5]
1. Cochrane Road/Monterey Road	AM	20.5	C+	20.7	C+	+0.013	+0.2
	PM	25.7	C	25.4	C	+0.050	-0.1
	SAT	24.4	C	26.5	C	+0.139	+0.3
2. Cochrane Road/Butterfield Boulevard	AM	13.2	B	13.4	B	+0.033	+0.5
	PM	12.3	B	13.7	B	+0.127	+2.4
	SAT	10.9	B+	12.8	B	+0.152	+3.0
3. Cochrane Road/Sutter Boulevard	AM	20.6	C+	20.7	C+	+0.024	+0.3
	PM	15.4	B	16.4	B	+0.090	+1.2
	SAT	13.6	B	13.4	B	+0.088	-0.6
4. Cochrane Road/Cochrane Plaza	AM	18.7	B-	18.6	B-	+0.020	+0.2
	PM	28.1	C	26.8	C	+0.085	-0.5
	SAT	23.4	C	22.8	C+	+0.082	+0.1
5. Cochrane Road/SB US 101 Ramp	AM	13.3	B	14.3	B	+0.071	+1.0
	PM	14.6	B	27.8	C	+0.265	+21.7
	SAT	19.9	B-	26.6	C	+0.373	+7.7
6. Cochrane Road/NB US 101 Ramp	AM	11.3	B+	13.7	B	+0.184	+3.0
	PM	10.9	B+	36.8	D+	+0.656	+31.1
	SAT	10.8	B+	**91.7**	**F**	**+0.922**	**>100**
7. Cochrane Road/DePaul Drive[6]	AM	12.0	B	16.6	B	NA	NA
	PM	12.6	B	23.9	C	NA	NA
	SAT	11.2	B	34.7	C-	NA	NA
8. Cochrane Road/Mission View Drive[7]	AM	16.9	C	**>100**	**F**	NA	NA
	PM	12.7	B	**>100**	**F**	NA	NA
	SAT	12.3	B	**>100**	**F**	NA	NA
9. Main Avenue/Monterey Road	AM	27.8	C	27.8	C	+0.003	+0.0
	PM	24.3	C	24.8	C	+0.045	+0.9
	SAT	22.0	C+	22.5	C+	+0.057	+1.0
10. Main Avenue/Butterfield Boulevard	AM	38.2	D+	38.5	D+	+0.014	+0.5
	PM	37.5	D+	37.7	D+	+0.048	+0.6
	SAT	31.9	C	32.3	C-	+0.064	+1.0
11. Main Avenue/Condit Road	AM	12.3	B	12.9	B	+0.023	+0.5
	PM	9.8	A	11.5	B+	+0.101	+2.4
	SAT	9.9	A	11.2	B+	+0.107	+1.8
12. Dunne Avenue/Monterey Road	AM	37.9	D+	38.3	D+	+0.013	+0.7
	PM	**39.5**	**D**	**40.9**	**D**	**+0.050**	**-0.1**
	SAT	30.9	C	32.1	C-	+0.062	+1.1
13. Dunne Avenue/Butterfield Boulevard	AM	35.3	D+	35.4	D+	+0.008	+0.4
	PM	37.6	D+	38.5	D+	+0.005	-2.1
	SAT	30.3	C	30.7	C	+0.026	-0.2
14. Dunne Avenue/ NB US 101 Ramp	AM	15.5	B	15.5	B	+0.001	-0.0
	PM	12.8	B	12.7	B	+0.003	-0.1
	SAT	9.9	A	9.8	A	+0.006	-0.1
15. Tennant Avenue/NB US 101 Ramp	AM	25.5	C	26.9	C	+0.028	+1.8
	PM	22.0	C+	23.9	C	+0.077	+2.3
	SAT	19.9	B-	22.9	C+	+0.107	+3.5

Notes:
1 AM = Morning peak-hour, PM = Evening peak-hour, SAT = Saturday midday peak-hour.
2 Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections using methodology described in the *2000 Highway Capacity Manual,* with adjusted saturation flow rates to reflect Santa Clara County Conditions. For two-way stop controlled unsignalized intersections, total control delay for the worst movement/approach, expressed in seconds per vehicle, is presented. LOS calculations conducted using the TRAFFIX level of service analysis software package.
3 LOS = Level of service
4 Change in critical movement delay between Background and Project Conditions. A decrease in the critical delay indicates project trips were added to movements with low delays thus causing a decrease in the overall critical delay.
5 Change in the critical volume-to-capacity ratio (V/C) between Background and Project Conditions.
6 Intersection is analyzed as unsignalized under Background Conditions, and with a traffic signal and additional lanes under Project Conditions.
7 Intersection is analyzed as unsignalized under Background, and with additional lanes under Project Conditions.
Significant impacts are designated in **bold** type.

Source: Fehr and Peers, Inc. 2005

Utilities (similar). There would be no substantial difference between the `Supermarket Alternative´ and the proposed project with respect to utilities.

Alternative 3 – Reduced Density Alternative

This alternative assumes a 40 percent reduction in the square footage to a 394,350 square foot commercial shopping center on a reduced footprint of approximately 40 acres, which would provide a buffer around the project site. A reduced commercial would generate less traffic, and subsequently result in a decrease in noise emissions in comparison to the proposed project. The impacts associated with the reduced density alternative are discussed below:

Comparative Analysis

Aesthetics and Visual Resources (similar). Although the `Reduced Density Alternative´ would involve the conversion of fewer acres of rural land to urban uses, the overall aesthetic/visual affect associated with construction of a 394,350 square foot commercial shopping center at the Cochrane Road/U.S. Highway 101 interchange would not be substantially different from that of the proposed project. Therefore, there is no substantial difference between the proposed project and the reduced density alternative with respect to aesthetics and visual resources.

Agricultural Resources (less). The `Reduced Density Alternative´ would result in the conversion of fewer acres of agricultural land to urban uses. The conversion of agricultural land at the project site was found to be significant and unavoidable. The reduced project size would result in a relatively lower magnitude of impacts to agricultural resources and any potential conflicts between agricultural and urban uses compared to the proposed project. Therefore, the `Reduced Density Alternative´ would result in less impacts to agricultural resources than the proposed project.

Air Quality (similar). The `Reduced Density Alternative´ would result in air quality emissions of approximately 120.97 lbs/day of Reactive Organic Gases (ROG), 117.72 lbs/day of Nitrogen Oxides (NO_x), and 82.49 lbs/day of Particulate Matter (PM_{10}). This would represent a reduction in the amount of air quality emissions in comparison to the proposed project. However, the resulting emissions associated with this alternative would exceed the air quality thresholds established by the BAAQMD. As such, the 'Reduced Density Alternative´ would reduce, but would not avoid the significant and unavoidable regional air quality impact associated with the proposed project. Therefore, there is no substantial difference between the proposed project and the `Reduced Density Alternative´ with respect to air quality.

Biological Resources (less). The `Reduced Density Alternative´ would result in the conversion of less acreage to urban uses and therefore would result in a reduction in the range of impacts to special status and other wildlife species, including burrowing owl and

migratory birds. Therefore, the `Reduced Density Alternative' would result in less impacts to biological resources than the proposed project.

Cultural Resources (similar). Since there are no known historic, archaeological, or paleontological resources present at the project site, the `Reduced Density Alternative´ would result in similar impacts to the proposed project with respect to cultural resources. In the event of discovery of previously unknown resources at the project site, contingent mitigation measures, as identified in Section 3.5, Cultural Resources, would be applied that would reduce the potentially significant effects to a less than significant level for both the proposed project and the `Reduced Density Alternative.´ As such, this alternative would result in no substantial difference over the proposed project with respect to cultural resources.

Geology and Soils (similar). All geologic, soils, and seismic conditions and hazards affecting both the proposed project and the `Reduced Density Alternative´ would be mitigated to a less than significant level through geotechnical engineering measures. There would be no substantial difference between the `Reduced Density Alternative´ and the proposed project with respect to geology and soils impacts.

Hazards and Hazardous Materials (similar). Since potential effects from hazardous materials would be mitigated to a less than significant level through implementation of mitigation measures incorporated within Section 3.8, Hazards and Hazardous Materials, there would be no impacts from hazardous materials associated with either the proposed project or the `Reduced Density Alternative.´ Therefore, there is no substantial difference in terms of hazardous materials impacts between the proposed project and the `Reduced Density Alternative´ with respect to hazards and hazardous materials.

Surface Water Hydrology and Water Quality (less). The drainage impacts of the `Reduced Density Alternative´ would be lower than the volumes of stormwater runoff associated with the proposed project. An increase in surface water runoff associated with the proposed project would be mitigated to a less than significant level through the construction of appropriately-sized stormwater basins. The erosion impacts and potential for non-point source pollution of surface water from urban pollutants would be similarly mitigated for both the proposed project and the `Reduced Density Alternative.´ However, because the `Reduced Density Alternative´ would result in less surface area than the proposed project, this alternative would have less impacts with respect to hydrology and water quality.

Land Use and Planning (similar). This alternative would generally include the same range of land uses as the proposed project, but at a smaller scale and would be designed to be consistent with the *City of Morgan Hill General Plan* and the *City of Morgan Hill Planning and Zoning Codes*. Therefore, there would be no substantial difference between the

`Reduced Density Alternative´ and the proposed project with respect to land use and planning.

Noise (less). The `Reduced Density Alternative´ would result in less vehicle trips to the project site and would therefore result in a relative decrease in the expected noise levels in comparison to the proposed project. As the proposed project would result in a short-term significant and unavoidable impact from the subsequent increase in noise levels at the single family residential homes located south of Cochrane Road, the `Reduced Density Alternative´ would result in less impacts than the proposed project.

Public Services (similar). Increased demand for fire protection, law enforcement, and other public services would not be significant for the proposed project and would not be significant for the `Reduced Density Alternative.' Therefore, there is no substantial difference between this alternative and the proposed project with respect to public services.

Transportation and Circulation (less): Impacts to study intersections would be mitigated for both the proposed project and the `Reduced Density Alternative.´ However, because the 'Reduced Density Alternative´ would result in less vehicle trips to the project site and congestion on the road network, this alternative would have less impacts with respect to transportation and circulation.

Utilities (similar). There would be no substantial difference between the `Reduced Density Alternative´ and the proposed project with respect to utilities.

Alternative 4 – Alternate Location Alternative

The `Alternate Location Alternative´ is located at the southeast corner of the Cochrane Road and U.S. Highway 101 intersection, immediately south of the project site and is comprised of six parcels (APN: 728-30-006, 008, and 009 and 728-31-009, 010, 011). This alternative site location is shown in **Figure 4-1**. This site is approximately 58.75 acres (approximately 7.74 acres less than the project site). Access to this site is provided by Cochrane Road and De Paul Drive.

According to the *City of Morgan Hill General Plan*, parcels 728-30-006, 008, and 009 have a land use designation of `Industrial´ and a zoning designation of `Planned Unit Development (ML).´ Parcel 728-31-010 and the northern portion of parcels 728-31-009 and -011 have a land use designation of `Commercial´ in the *City of Morgan Hill General Plan* and a zoning designation of `Planned Unit Development (HC).´ The southern portion of parcels 728-31-009 and 011 has a land use designation of `Commercial´ and a zoning designation of `CO, Administrative Office.' These parcels consist primarily of fallow agricultural land; however, there is an existing detention pond and one single family residential home located on parcel 728-31-010. This alternative would include the same range of land uses as the proposed project**.** The impacts associated with the alternative location are discussed below:

Comparative Analysis

Aesthetics and Visual Resources (greater). The `Alternate Location Alternative´ would result in a slightly greater range in impacts in comparison to the proposed project with respect to the change in the visual character of the project site. This location is also considered a gateway location and would require a higher level of design, which would be subject to review and approval by the Architectural Review Board due to visibility of this location from U.S. Highway 101. However based on the lower elevation of this site, this `Alternate Location Alternative' would result in a slightly greater impact than the proposed project based on visibility from northbound U.S. Highway 101.

Agricultural Resources (similar). The `Alternate Location Alternative´ would have similar impacts to the proposed project with respect to the conversion of the project site from rural residential and agricultural uses to urban uses. According to the *Santa Clara County Important Farmland Map*, this site is comprised of prime agricultural land and therefore would also result in a significant impact to agricultural resources with conversion of this site to urban uses.

Air Quality (similar): The `Alternate Location Alternative´ would result in the same number of vehicle trips as the proposed project, which would result in similar air quality emissions as the proposed project and would therefore result in a significant air quality impact. As such, this alternative would result in no substantial difference over the proposed project with respect to air quality.

Biological Resources (similar). The `Alternate Location Alternative´ would result in similar impacts as the proposed project to special status and other wildlife species, including burrowing owl, and migratory birds and the conversion of potential foraging and nesting habitat. As such, this alternative would result in no substantial difference over the proposed project with respect to biological resources.

Cultural Resources (similar). Since there are no known historic, archaeological, or paleontological resources present at the project site, it is likely that the `Alternate Location Alternative´ would result in similar impacts to the proposed project with respect to cultural resources. In the event of discovery of previously unknown resources at the project site, contingent mitigation measures, as identified in Section 3.5, Cultural Resources, would be applied that would reduce the potentially significant effects to a less than significant level for both the proposed project and the `Alternate Location Alternative.' As such, this alternative would result in no substantial difference over the proposed project with respect to cultural resources.

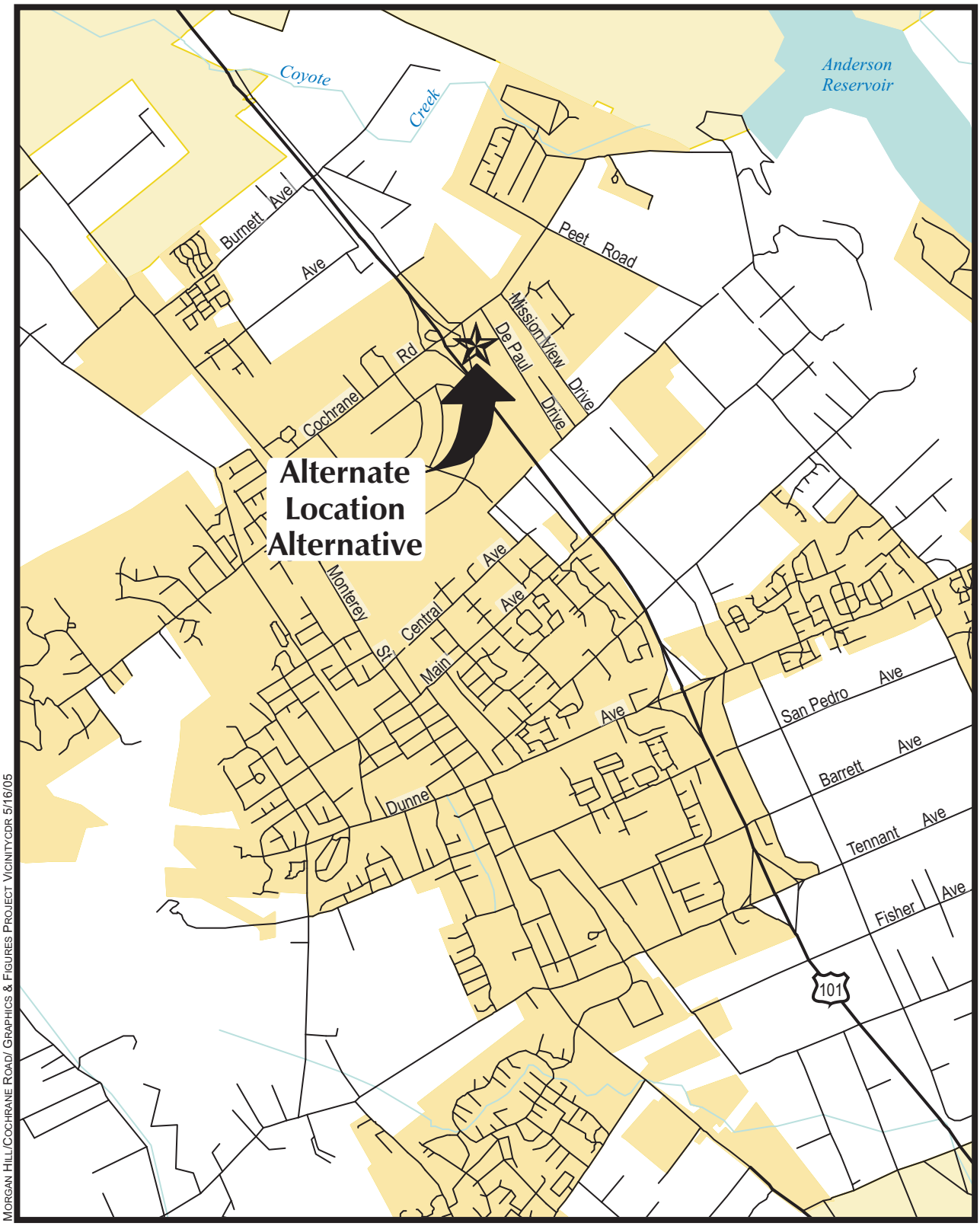

FIGURE 4-1
ALTERNATE LOCATION ALTERNATIVE

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Geology and Soils (similar). All geologic, soils, and seismic conditions and hazards affecting both the proposed project and the `Alternate Location Alternative´ would be mitigated to a less than significant level through geotechnical engineering measures. Therefore, there would be no substantial difference between the proposed project with respect to geology and soils impacts.

Hazards and Hazardous Materials (similar). Since potential effects from hazardous materials would be mitigated to a less than significant level through implementation of mitigation measures incorporated within Section 3.8, Hazards and Hazardous Materials, there would be no impacts from hazardous materials associated with the proposed project. The `Alternate Location Alternative´ is expected to result in a similar range of impacts as the proposed project with respect to hazards and hazardous materials. As such, there is no substantial difference in terms of hazardous materials impacts between the proposed project and the `Alternate Location Alternative´ with respect to hazards and hazardous materials.

Surface Water Hydrology and Water Quality (similar). The drainage impacts of the `Alternate Location Alternative´ and that of the proposed project would result in similar volumes of stormwater runoff. These impacts would be mitigated to a less than significant level through the construction of appropriately-sized stormwater basins. The erosion impacts and potential for non-point source pollution of surface water from urban pollutants would be similarly mitigated for both alternatives as discussed in Section 3.8, Surface Water Hydrology and Water Quality. As such, there would be no substantial difference between the proposed project and the `Alternate Location Alternative' with respect to surface water hydrology and water quality.

Land Use and Planning (greater). This alternative would generally include the same range of land uses as the proposed project and would require a general plan amendment in order to amend the southern portion of site that is designated for industrial uses in the *City of Morgan Hill General Plan*. In addition, the zoning would be inconsistent for approximately two thirds of the project site since the mid section is zoned `CO´ and this location is not identified in the *City of Morgan Hill General Plan* as the location of a `Sub-Regional Commercial Site.´ Therefore, the `Alternate Location Alternative´ would result in a slightly greater impact than the proposed project with respect to land use and planning.

Noise (similar). As the proposed project would result in a short-term significant and unavoidable impact from the subsequent increase in noise levels at one of the single family residential homes located at this alternate site location, the adjacent single family home would continue to be subject to excessive noise levels with implementation of this alternative. Therefore, the `Alternate Location Alternative´ would result in similar impacts as the proposed project with respect to noise.

Public Services (similar). The `Alternate Location Alternative´ would result in similar impacts to public services. Increased demand for fire protection, law enforcement, and other public services would not be significant for the proposed project and would not be significant for the `Alternate Location Alternative.´ Therefore, there is no substantial difference between this alternative and the proposed project with respect to public services.

Transportation and Circulation (greater). The `Alternate Location Alternative´ would result in the same number of vehicle trips as the proposed project, which would result in similar traffic distribution and impacts as the proposed project. As the `Alternate Location Alternative´ is approximately 7.74 acres less than the project site, the parking impacts associated with this alternate site location would likely be greater than the proposed project.

Utilities (similar). There would be no substantial difference between the `Alternate Location Alternative' and the proposed project with respect to utilities.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires that the environmentally superior alternative be identified. If the environmentally superior alternative is the `No Project´ Alternative, the EIR shall also identify an environmentally superior alternative among other alternatives. In this case, Alternative 1, `No Project/No Development,´ represents the environmentally superior alternative because, as determined from the above analysis, most impacts would be reduced relative to the proposed project. However, the `No Project/No Development´ meets none of the project objectives and is inconsistent with the General Plan and zoning land use designations. From the remaining options, Alternative 2, the `Reduced Density Alternative,´ would be the environmentally superior alternative and would result in a lesser degree of environmental impact as compared to the proposed project. This is due primarily to the reduced impacts related to traffic, parking and circulation and associated reduction in noise and air quality impacts that would result from the reduced square footage. However, this scenario would not be financially feasible to the project applicant and would not meet the applicant's project objectives or the City's objectives to provide commercial retail shopping center that serves the local and regional market, results in a net fiscal benefit to the City, reduces sales dollar leakage, and creates new jobs for the City of Morgan Hill. **Table 4-3** compares each considered alternative with the proposed project.

TABLE 4-3
COMPARISON OF PROJECT ALTERNATIVES TO THE PROPOSED PROJECT

Environmental Category	Alternative #1 "No Project/No Development Alternative"	Alternative #2 "Supermarket Alternative"	Alternative #3 "Reduced Density Alternative"	Alternative #4 "Alternate Location Alternative"
Aesthetics and Visual Resources	Less	Similar	Similar	Greater
Agricultural Resources	Less	Similar	Less	Similar
Air Quality	Less	Greater	Similar	Similar
Biological Resources	Less	Similar	Less	Similar
Cultural Resources	Less	Similar	Similar	Similar
Geology and Soils	Less	Similar	Similar	Similar
Hazards and Hazardous Materials	Less	Similar	Similar	Similar
Surface Water Hydrology and Water Quality	Less	Similar	Less	Similar
Land Use and Planning	Similar	Similar	Similar	Greater
Noise	Less	Similar	Less	Similar
Public Services	Less	Similar	Similar	Similar
Transportation and Circulation	Less	Greater	Less	Greater
Utilities	Less	Similar	Similar	Similar
Consistency with Project Objectives	Less Consistent	Consistent	Less Consistent	Less Consistent

Greater = Impacts greater than those identified for the proposed project would result.
Less = Impacts less than those identified for the proposed project would result.
Similar = Impacts similar to those identified for the proposed project would result.
Consistent = Alternative would be consistent with Project Objectives.
Less Consistent = Alternative would be less consistent with Project Objectives.

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